

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Lifeline and Link Up)	WC Docket No. 03-109

**COMMENTS OF THE
PARTNERSHIP FOR A CONNECTED ILLINOIS, INC.**

The Partnership for a Connected Illinois (PCI) respectfully submits these comments in response to the Commission's recent Notice of Proposed Rulemaking (NPRM) regarding its request for comments on proposals to reform and modernize Lifeline/Link Up.

Specifically, our comments will focus on the Role of the States (paragraph 291), and the role of state-designated entities under a grant program initiated by the U.S. Department of Commerce's National Telecommunications and Information Administration (NTIA) (paragraph 295).

PCI is a 501(c)(3) non-profit corporation headquartered in Springfield, Illinois. PCI has a three-fold mission: (a) to collect and publish broadband data, (b) to ensure broadband access throughout the State, and (c) to maximize broadband's impact and use by the State's residents, businesses, governmental units and Community Anchor Institutions. PCI is the State-designated entity under the NTIA's State Broadband Data and Development (SBDD) grant program. Additionally, PCI is authorized under Illinois statute to implement a comprehensive, statewide high-speed internet deployment strategy and demand creation initiative.

The Commission seeks comment on the role that states should play in any pilot program integrating broadband service into the low-income program.¹

As the SBDD entity for the State of Illinois, PCI has worked closely with the State in assisting to coordinate the expenditure of funds awarded to State, non-profit, and private-sector recipients of

¹ *Lifeline and Link Up Reform and Modernization, Federal-State Joint Board on Universal Service, Lifeline and Link Up*, WC Docket No. 11-42, CC Docket No. 96-45 and WC Docket No. 03-109, Notice of Proposed Rulemaking, FCC 11-32 (rel. March 4, 2011) ("*NPRM*"), paragraph 291.

funds under the NTIA's Broadband Technologies Opportunity Program (BTOP) and the Rural Utilities Service's Broadband Infrastructure Program (BIP). Approximately \$244 million in federal funds were awarded to such entities within the State of Illinois.² Supplemented by State funds and by private-sector investments, approximately \$353 million is currently being invested in BTOP and BIP programs within the State.³ Additionally, PCI is charged with administering State funds for private-sector BTOP and BIP recipients within Illinois. As this state-designated entity, PCI acts as a neutral third-party – independent of an ETC or another entity that might receive funding under a revised Lifeline and Linkup program.

The Commission also seeks comment on (a) limiting program participation to Eligible Telecommunications Carriers (ETCs) that partner with entities approved by the NTIA's State Broadband Data and Development (SBDD) Program, or (b) encouraging ETCs to partner with SBDD grantees.⁴

PCI strongly encourages both ETCs and non-ETCs to partner with SBDD grantees, such as PCI, in the development and application of Lifeline and Link Up pilot programs.

Through PCI's involvement in BTOP and BTOP infrastructure and adoption projects, PCI and the State of Illinois have the unique ability to identify and target specific low-income populations that would benefit from the transition to broadband. States like Illinois, and organizations like PCI, have a stake in the sustainability of broadband infrastructure such as fiber-optic wires, wireless last-mile transmission, public computing centers, and sustainable adoption programs. The knowledge and experience gained by PCI through the marshaling of federal, state, regional, private and non-profit programs and resources could enable an SBDD organization such as PCI to successfully lead the transition from the universal service fund to a universal broadband fund.

As an SBDD grantee, PCI works to promote adoption and use of broadband in ways that will provide social and economic benefits in Illinois. In particular, PCI is working with NTIA awardees such as Connected Living, in Northern Illinois, in programs that support broadband for low-income seniors in public housing⁵; and the City of Chicago, in an extensive program to create and nurture "Smart Communities" throughout the city.⁶

² "Illinois ARRA Awardees," flyer produced by the Partnership for a Connected Illinois for September 28, 2010, meeting of broadband awardees, Abraham Lincoln Presidential Library, Springfield, Illinois.

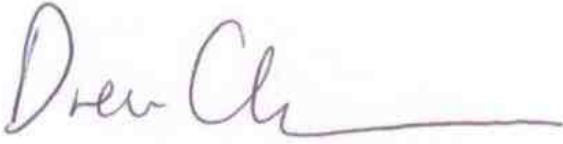
³ *Id.*

⁴ NPRM paragraph 295.

⁵ "Getting Illinois Low Income Seniors and People with Disabilities Online" involves providing Connected Living Internet training to seniors and people with disabilities in 23 HUD public housing and Section 8 buildings in 10 communities in Northern Illinois. The program's goals are to demonstrate the practical benefits of the Internet to government supported housing residents and to create local support networks that can extend the benefits of the education and training programs provided in the buildings to the 50,000 residents in the surrounding neighborhoods through local collaborations and an outreach program. The program also incorporates strong research, third party evaluation by Northern Illinois University and dissemination elements using a blog, newsletters and a website to maximize the sharing of this demonstration with other HUD buildings in Illinois and elsewhere in the country.

⁶ The Smart Communities Program, a Round 1 BTOP Sustainable Broadband Adoption winner, is a collaboration between the City of Chicago, LISC/Chicago, the Chicago Public Library Foundation and the Chicago Community

Hence, PCI is working to ensure that low-income citizens benefit from federal, state and private investment in broadband. Because of PCI's role in the coordination process throughout the State of Illinois, PCI – and other SBDD entities – are well-poised to play a role in a reformulated Lifeline Linkup program.

A handwritten signature in purple ink, reading "Drew Clark", followed by a long horizontal line.

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Trust to promote comprehensive technology adoption among 270,000 residents and small businesses in five pilot digitally-underserved Chicago neighborhoods. Emphasis is on the following target markets: (1) low income families needing job skills and jobs; (2) small businesses that could benefit from the effective use of technology to grow their companies and create local jobs; (3) youth who want the opportunity to use technology to learn and create in new ways; and (4) civic leaders seeking to use digital tools to expand community programs and progress. The Smart Communities will inform and help guide the City's second BTOP program - Smart Chicago Public Computer Centers - which will increase public computing capacity by 40% and create Chicago's first centralized Digital Skills Initiative. Similar demographics and examples of underserved neighborhoods can be found in all BTOP and BIP neighborhoods throughout Illinois.